

April 26, 2006

Ms. Gail M. Garvin
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Dear Ms. Garvin:

The Office of Pollution Prevention and Toxics is transmitting EPA's preliminary comments on the robust summaries and test plan for 2,4-dichlorophenol, sodium salt (CAS No. 3757-76-4), posted on the ChemRTK HPV Challenge Program Web site on November 18, 2005.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

In general, the robust summaries submitted for the sponsored substance did not offer enough detail, or were not provided for some endpoints that were referenced in the test plan (chemical fate endpoints). The submitter should consult EPA guidance documents for the preparation of robust summaries (<http://www.epa.gov/opptintr/chemrtk/guidocs.htm>) and provide adequate robust study summaries for all available SIDS endpoint data for the sponsored substance. Robust summaries for the sponsored substance should reference analog data summaries where appropriate.

The additional information provided by Dow in August 2003 for the analog 2,4-dichlorophenol (2,4-DCP; CAS No. 120-83-2) is helpful; however, full robust study summaries need to be provided. France sponsored 2,4-DCP in the OECD SIDS program and the dossier from that program should be completed in the near future and available at <http://www.chem.unep.ch/irptc/sids/OECD/SIDS/sidspub.html>. Prior to publication, the information may also be obtainable from the OECD contact for France.

The justification for using data on 2,4-DCP to satisfy the ecological effects endpoints should be moved out of the robust summaries and into the Test Plan.

Because of its potential endocrine disruptor effects, a 2-generation rat study on 2,4-DCP has been conducted (Japan, METI) and will be summarized in the above Dossier. If a copy of the study is desired, it can be obtained by contacting the Japanese authorities (Ms. Mai Sekizawa at sekizawa-mai@ceri.jp) or the study author (Hiroaki Aoyama at aoyama@iet.or.jp). 2,4-DCP is a substance of concern in the EU implementation of the Community Strategy for Endocrine Disruptors (http://europa.eu.int/comm/environment/endocrine/strategy/substances_en.htm).

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that the Dow Chemical Company advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact Mark Townsend, Chief of the HPV Chemicals Branch, at 202-564-8617. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

/s/

Oscar Hernandez, Director
Risk Assessment Division

cc: W. Penberthy
J. Willis